



Peckar & Abramson

A Professional Corporation • Attorneys & Counselors at Law

www.pecklaw.com

70 Grand Avenue
River Edge, NJ 07661
tel. 201.343.3434
fax 201.343.6306

New York, NY
Los Angeles, CA
Oakland, CA
Washington, D.C.
Miami, FL
Chicago, IL
River Edge, NJ
Austin, TX
Dallas, TX
Houston, TX

International Alliances

Argentina
Brazil
Canada
Chile
Colombia
Costa Rica
El Salvador
England
Guatemala
India
Mexico
Panama
Peru
Uruguay

VIA ECF

February 28, 2020

Magistrate Judge Robert W. Lehrburger
U.S. District Court – Southern District of New York
United States Courthouse
500 Pearl Street, Courtroom 18D
New York, New York 10007-1312

Re: Esthefany Heredia, et al. v. Americare, Inc., et al.
Civil Case No.: 17-cv-6219

Dear Magistrate Judge Lehrburger:

This firm represents Defendants in the above referenced action. We are writing to request an extension of the current deadline to file Defendants' reply to Plaintiffs' opposition to Defendants' Motion for Summary Judgment from March 12, 2020 to March 20, 2020. Plaintiffs filed their Opposition to Defendants' Motion for Summary Judgment last night and simultaneously Cross-Moved for Summary Judgment. Plaintiffs' Cross-Motion, coupled with the fact that Counsel for Defendants is engaged in an arbitration next week has necessitated additional time to file Defendants' reply. This is the first time a request has been made to extend Defendants' time to file a reply (aside from the one-week extension previously granted to Plaintiffs to file their opposition, which simultaneously granted an extension to Defendants in light of Plaintiffs' extension). Counsel for Plaintiffs has consented to this request.

Thank you for your consideration of this request.

Respectfully Submitted,

/s/ Shannon D. Azzaro

Shannon D. Azzaro

cc: All Counsel of Record (via ECF)